

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Mark & Diane Quinn	:	
	:	Chapter 13
	:	
	:	
Debtor	:	No.: 17-11815JKF

RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY WILMINGTON SAVINGS FUND SOCIETY, FSB

COMES NOW, Mark & Diane Quinn, hereinafter referred to as “Debtors,” by and through their undersigned Counsel, Brad J. Sadek, Esquire, and in response to the Motion for Relief filed by Wilmington Savings Fund Society FSB, “Movant”, and hereby avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Denied.
9. Denied. By way of further response, a post-petition mortgage payment history is requested from Movant.
10. Denied.
11. Denied.
12. Denied.

13. Denied.

14. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: March 16, 2019

/s/ Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008